

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DAVID CATANZARO,**Plaintiff****v.****SEAMAN GARSON, LLC/LLP, et al.****Defendants**

) **CASE NO. 1:13-cv-00996-DAP**
)
) **JUDGE DAN AARON POLSTER**
)
)
) **JOINT MOTION OF ALL PARTIES TO**
) **AMEND CASE MANAGEMENT**
) **SCHEDULING ORDER**
)
)
)

Plaintiff David Catanzaro and Defendants Seaman Garson, LLC, James A. DeRoche, and Wayne D. Porter, by and through their respective counsel, hereby jointly request that the Court amend the current Case Management Scheduling Order to provide the parties additional time to complete discovery and file dispositive motions. The parties respectfully request that the Court amend the current dates as follows:

<u>ACTION</u>	<u>ORIGINAL DATE</u>	<u>PROPOSED NEW DATE</u>
Discovery Cutoff	August 19, 2014	October 20, 2014
Dispositive Motion Deadline	September 19, 2014	December 19, 2014

Good grounds support the requested extensions of time, which are not made for purposes of delay. The parties have been progressing through written discovery, but significant discovery remains to be conducted, including depositions. Specifically, the Defendants have responded to Plaintiff's discovery requests and have produced voluminous materials. Plaintiff has provided written responses to Defendants Seaman Garson and James DeRoche's first set of discovery requests and anticipates producing responsive materials by mid July. Plaintiff has similarly

obtained an extension to respond to Defendant Wayne Porter's first set of discovery requests on or before July 21, 2014. The parties respectfully submit, however, that depositions of the parties and other potential witnesses cannot be conducted until all requested materials have been exchanged and the respective parties have had an opportunity to analyze and evaluate the same. The requested extension will allow time for: (1) Plaintiff to respond to discovery and produce responsive materials, (2) Defendants to evaluate the produced materials and seek to resolve any claimed deficiencies in production, and (3) the parties to schedule and conduct the necessary depositions prior to preparing dispositive motions.¹

WHEREFORE, the Plaintiff and all Defendants jointly request that the Case Management Scheduling Order be amended to extend (1) the discovery cutoff date to October 20, 2014, and (2) the dispositive motion deadline to December 19, 2014.

Respectfully submitted,

/s/Shane A. Lawson

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Seaman Garson, LLC and James A. DeRoche

¹ It should be noted that the proposed extension of the discovery cutoff date contemplates the difficulties associated with coordinating the calendars of numerous attorneys (parties and their counsel) for purposes of scheduling depositions.

/s/ Barton R. Keys (per consent)

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/Shane A. Lawson

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